

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Gettys Bryant Millwood and John Baker)
McClanahan, Personal Representative of the)
Estate of Melissa Buchanan, on behalf of)
Themselves and all others similarly situated,)

C/A No. 7:19-cv-01445-DCC

Plaintiffs,)

CONSENT MOTION TO ALTER
TIME FOR PARTIES TO FILE
JOINT STATUS REPORT FOR JULY
2021

v.)

State Farm Life Insurance Company,)

Defendant.)

Come now Plaintiffs and Defendant (the “Parties”) who move this Court pursuant to Rule 6(b), FRCP and Rule 6.01 of the Local Rules of Civil Procedure, for an order granting an extension of time, until and including July 23, 2021, for the Parties to submit their July 2021 Joint Status Report pursuant to ECF #64.

As support for this Motion and in compliance with Rule 6.01, the Parties through their undersigned counsel would show the following:

1. Pursuant to the Court directive that the Parties are to submit monthly joint status reports by the 15th day of each month (ECF #64), the Parties’ July 2021 Joint Status Report is presently due on July 15, 2021.
2. The extension, if granted, would extend the Parties’ time to submit their July 2021 Joint Status Report by eight (8) days.
3. The extension requested would not impact any other case deadlines.
4. The Parties are aware of the Court’s standing preference that a motion to extend a deadline should not be filed on the date of the current deadline absent a showing of extraordinary circumstances. The reason, good cause, and extraordinary circumstances for this requested extension are as follows:
 - a. The parties are exchanging new and additional information on a near-daily basis and completing depositions.
 - b. At least three discovery issues have been raised yesterday which arise out of a recently completed deposition and further discovery exchange referenced above.
 - c. The Parties held a phone conference this morning to discuss these issues and agreed that they need more time to research and meet and confer, which cannot be accomplished today.

- d. The Parties wish to meet and confer on these issues to try in good faith to resolve them before reporting on the issues in this month's Joint Status Report or otherwise bring them to the Court's attention.
 - e. The Parties believe that with the additional time requested, they may be able to resolve their disputes on some or all these discovery issues. This will be to the Parties' benefit and also will decrease the burden on the Court in its review of the July Joint Status Report and any related motion practice.
5. All Parties consent to this request as evidenced by counsels' signatures appearing below.

Accordingly, for these reasons and good cause based on extraordinary circumstances, the Parties move for an Order extending the date to submit the July 2021 Joint Status Report from July 15, 2021 to July 23, 2021.

WE SO MOVE AND CONSENT:

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